

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

Thomas Marshall,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 1:24-cv-00191-PB-AJ
	)	
United States of America, Federal Bureau of	)	
Investigation, BATF, and Merrick Garland, in	)	
his official capacity as Attorney General,	)	
	)	
Defendants.	)	
_____	)	

DEFENDANTS' MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendants move this Court to dismiss Plaintiff's Complaint for failure to state a plausible claim for relief.

In support of this Motion, Defendants refer the Court to the supporting memorandum of law, and the record of this litigation.

Therefore, Defendants request this Court dismiss the Complaint under Rule 12(b)(6).

Respectfully submitted,

JANE E. YOUNG  
United States Attorney

Dated: September 23, 2024

By: /s/Anna Dronzek

Anna Dronzek  
Assistant United States Attorney  
Colorado Bar No. 43912  
United States Attorney's Office  
53 Pleasant Street, 4<sup>th</sup> Floor  
Concord, NH 03301  
(603) 225-1552  
[Anna.Dronzek@usdoj.gov](mailto:Anna.Dronzek@usdoj.gov)